

## STATE BUILDING CODE INTERPRETATION NO. I-17-00

March 10, 2000

The following is offered in response to your letter in which you request a formal interpretation of Section 102.4 of the 1996 International Mechanical Code (IMC) portion of the 1999 State Building Code which states in part that additions, alterations, renovations or repairs to a mechanical system shall conform to that required for a new mechanical system without requiring the existing mechanical system to comply with all of the requirements of this code.

The scenario you describe is the rehabilitation of an existing Use Group R-2 building that relies on natural ventilation via operable windows to meet the requirements for ventilation of a bathroom.

**Question:** Are the windows considered an “existing mechanical system” for the ventilation of the bathrooms, or do the bathrooms have to be mechanically ventilated per section 402.3.1 of the 1996 IMC?

**Answer:** If the code in effect at the time of application for permit to construct the existing building allowed the bathroom ventilation requirement to be satisfied by the existing operable windows, said windows comprised the mechanical system for ventilation of the bathrooms. Assuming that no change of occupancy has taken place and that there is no change to the existing windows in the bathrooms, section 102.4 of the 1996 IMC would permit the continued use of the windows in the bathroom to provide natural ventilation without the addition of mechanical ventilation.